

1 **JOCELYN WONG**

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6 *Pro Per*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 JOCELYN WONG, an Individual,

10 Plaintiff,

11 v.

12 SOUTHERN NEVADA REGIONAL HOUSING  
13 AUTHORITY, a Nevada Quasi-Governmental  
14 Agency; DOES 1 through 25, inclusive; and  
15 ROE CORPORATIONS 1 through 25, inclusive,

16 Defendants.

Case No.: 2:20-cv-01910-JAD-VCF

17 **STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER**  
18 **(SUBMITTED IN COMPLIANCE WITH LR 26-1(e))**

19 Plaintiff, Jocelyn Wong and Defendant, Southern Nevada Regional Housing  
20 Authority, by and through their respective attorneys of record, hereby submit this Stipulated  
21 Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure 26(f) and  
22 Local Rule 26-1(e).

23 Further, pursuant to Local Rule 26-1(d) and Federal Rule of Civil Procedure 26(f), a  
24 conference was held on November 23 , 2021 at 9:19 a.m. and was attended by: JOCELYN  
25 WONG, *pro per* and MAHOGANY TURFLEY, ESQ. of the law firm PARKER, NELSON  
& ASSOCIATES on behalf of Defendant. The parties were able to agree to the following  
Proposed Discovery Plan:

1 **1. Date that Defendant First Appeared: November 12, 2020**, which is the date of the filing  
2 of Defendant's Motion to Dismiss.

3 **2. Date to Exchange Initial Disclosures:** Defendants filed Initial Disclosures on **October**  
4 **20, 2021** prior to the fourteen (14) days after the Rule 26(f) conference in accordance with  
5 Rule 26(a)(1)(C). Thereafter, Plaintiff, Jocelyn Wong filed her Initial Disclosures on  
6 **October 28, 2021**.

7 **3. Discovery Plan:** The parties propose the following Discovery Plan

8 **Discovery Cut-Off Date:**

9 Deadline for *completion* of discovery: **Saturday, May 7, 2022**.

10 All discovery will be completed no later than which is 180 days from the date of the  
11 completion of the second ENE Settlement Conference which was held on *November 8,*  
12 *2021* the completion of the stipulated discovery order in order to have time to conduct  
13 proper discovery . Discovery will be needed on the claims set forth in the Complaint,  
14 as well as the defenses relevant to the action. The parties agree to engage in all  
15 permissible discovery as allowed by the Federal Rules of Civil Procedure and Local  
16 Rules.

17 **LR 26-1(b)(3) Disclosures (Experts):** The parties propose that disclosure of  
18 experts shall proceed according to LR 26-1(b)3(D):

19 Disclosures concerning experts shall occur **Tuesday March 8, 2022** which is  
20 sixty (60) days before the discovery cut-off date; and

21 Disclosures respecting rebuttal experts and rebuttal expert reports shall occur on  
22 **Thursday, April 7, 2022**.

23 **4. Amendment of the Pleadings and Adding Parties:** The parties propose that they shall  
24 have until **Sunday, February 6, 2022**, to file any motion to amend the pleadings or to add  
25 parties. This is ninety (90) days before the discovery cut-off, which is in accordance with  
LR 26-1(e)(2).

**5. Interim Status Report:** The parties propose that the parties shall file their interim status  
report by **Tuesday, March 8, 2022**, required by LR 26-3 by, which is sixty (60) days  
before the discovery cut-off date.

**6. Dispositive Motions:** The parties propose that the parties shall have until **Monday, June**  
**6, 2022**, to file dispositive motions, which does not exceed thirty (30) days after the  
discovery cut-off date that LR 26-1(b)(4) presumptively set for filing dispositive motions.

- 1 **7. Joint Pre-Trial Order:** The parties propose that the parties shall file their joint pre-trial  
2 order on or before **Wednesday, July 6, 2022**. In the event dispositive motions are filed,  
3 the date for filing the Joint Pre-Trial Order shall be suspended until thirty (30) days after  
4 decision of the dispositive motions or further order of the Court pursuant to LR 26-1(b)(5).
- 5 **8. FRCP 26(b)(3) Disclosures:** The parties propose that the disclosures required by FRCP  
6 26(a)(3) and any objections there to shall be included in the Pre-Trial Order pursuant to  
7 LR 26-1(b)(6).
- 8 **9. Settlement Prospects In This Case May Be Enhanced By:** The likelihood of settlement  
9 cannot presently be established but the parties will discuss the possibility of the same.
- 10 **10. Alternative Dispute Resolution:** The parties certify that they met and conferred  
11 regarding the ADR possibilities in this case; yet this case has had two Court mandated  
12 ENE as required by LR-26-1(b)(7).
- 13 **11. Alternative Forms of Case Disposition:** The undersigned counsel herein certify that  
14 each has met, conferred and considered to consent to trial by a magistrate judge under and  
15 the use of the Short Trial Program as required by LR 26-1(b)(8).
- 16 **12. Electronic Discovery:** Pursuant to LR 26-1(b)(9), the undersigned counsel certifies that  
17 during the meet and confer they discussed the parties' respective intent to present  
18 evidence in electronic format to jurors for the purposes of jury deliberations. The parties  
19 do not envision that any significant relevant information is stored in electronic format.  
20 Accordingly, the parties agree to produce any electronically stored information in paper  
21 and/or pdf format. If the parties learn that electronically stored information is available  
22 and would impact this case, the parties will meet and confer about the production of that  
23 information in an acceptable format. Thus, the undersigned counsel has yet to reach any  
24 stipulation regarding providing discovery in an electronic format.
- 25 **13. Inadvertent Disclosures and Confidentiality Issues:** The parties agree to work  
cooperatively together with regard to Inadvertent Disclosures and Confidentiality Issues.  
Further, pursuant to Federal Rules of Evidence 502(d) and (e), the parties both agree and  
request that entry of this order establish that inadvertent or mistaken production or  
disclosure of documents or other information subject to the attorney-client privilege, the  
work product doctrine, or other privilege shall not be deemed a waiver of a claim of  
privilege, either as to the specific information disclosed or as to any other related  
information for purposes of this or any other litigation. If a producing party inadvertently  
produces or otherwise discloses to a receiving party information that is subject to such  
privilege or immunity, the producing party shall promptly upon discovery of such  
disclosure so advise the receiving party in writing and request that the inadvertently  
disclosed information be returned, stricken or otherwise appropriately handled to reverse  
the inadvertent disclosure. The receiving party shall return all copies of the inadvertently

produced material within five business days of receipt of the request and otherwise cooperate to fulfill this agreement. Any notes or summaries referring or relating to any inadvertently produced privileged material shall be destroyed. No inadvertent disclosure of privileged or trial preparation material shall operate as a waiver to any claim that the document(s) in privileged.

**14. Extensions or Modifications of Discovery Plan and Scheduling Order:** In accordance with Local Rule 26-4, a stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty-one (21) days before the expiration of the subject deadline.

**15. Reservation of Rights:** The parties reserve their rights and this discovery plan shall not be deemed to constitute a waiver of their rights concerning the filing of any motion.

Respectfully Submitted By:

DATED this 29<sup>th</sup> day of November, 2021

/s/ Jocelyn Wong  
**JOCELYN WONG**  
 7907 Carson Creek Street  
 Las Vegas, Nevada 89113  
*E: cjkkwong@gmail.com*  
*Attorneys for Plaintiff*

DATED this 29<sup>th</sup> day of November, 2021

/s/ Mahagony Turfley  
**MAHAGONY TURFLEY, ESQ.**  
 State Bar No.: 013974  
**THEODORE PARKER, ESQ.**  
 State Bar No.: 04716  
**PARKER NELSON & ASSOCIATES**  
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*Attorneys for Defendant*

**IT IS SO ORDERED:**

**DATED** this 30th day of November 2021.



~~THE HONORABLE JENNIFER A. DORSEY~~  
 UNITED STATES MAGISTRATE JUDGE  
 Cam Ferenbach